

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	CHAPTER 7
	:	
KYRA JENNIFER GIBSON	:	BANKRUPTCY NO. 21-10571 (AMC)
	:	
Debtor	:	
	:	

NOTICE OF MOTION, RESPONSE DEADLINE AND IN-PERSON HEARING DATE

Christine C. Shubert, Chapter 7 Trustee (the "Trustee"), has filed a Motion for Entry of an Order Authorizing the Sale of a Consent Judgment Entered on November 16, 2022 in Favor of the Trustee and Against Ronald Jeffrey Washington, Jr. and Ashley Elizabeth Washington Free and Clear of all Liens, Claims and Encumbrances Pursuant to 11 U.S.C. § 363 (the "Motion").

**NOTICE OF SALE OF CONSENT JUDGMENT ENTERED ON NOVEMBER 16, 2022
IN FAVOR OF THE TRUSTEE AND AGAINST RONALD JEFFREY WASHINGTON,
JR. AND ASHLEY ELIZABETH WASHINGTON IN THE MATTER OF *SHUBERT V.
WASHINGTON, ET AL.*, U.S.B.C. E.D.PA, ADVERSARY NO. 21-00039 (AMC) TO
TO FIRST CAPITAL PROPERTIES, LTD FOR A PRICE OF \$2,600.00**

**THE CONSENT JUDGMENT HAS A FACE VALUE OF \$25,000.00 AND A CURRENT
VALUE OF \$21,666.67 AS PAYMENTS IN THE AMOUNT OF \$3,333.34 WERE MADE
ON ACCOUNT OF THE CONSENT JUDGMENT**

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)
2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before **August 4, 2025**, you or your attorney must file a response to the Motion. (*see Instructions on next page*).
3. **A hearing on the Motion** is scheduled to be held on **September 3, 2025, at 12:30 p.m. in Courtroom No. 4, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107**. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**. Requests for participation other than in person must be made pursuant to Local Bankruptcy Rule 9076-1.
4. **If you do not file a response to the Motion**, the court may enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed a response.
6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed below.

Filing Instructions

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at

Clerk
United States Bankruptcy Court
for the Eastern District of Pennsylvania
The Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19106
9. **If you mail your response** to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Robert W. Seitzer, Esquire
Karalis PC
1900 Spruce Street
Philadelphia, PA 19103
Phone No.: (215) 546-4500
Fax No.: (215) 985-4175
E-mail address: rseitzer@karalislaw.com

Dated: July 14, 2025